

**From:** [REDACTED]  
**To:** [REDACTED]  
**CC:** [REDACTED]  
**Sent:** 4/18/2018 1:36:48 PM  
**Subject:** FW: Golsstein & Russell - Questions

Good morning [REDACTED] has asked me to address your questions. She is heading for the door on her way to a much earned vacation.

1. Your medical plan is the CareFirst BluePreferred PPO. This plan works in all states because it qualifies for the national BlueCard Program – this is where the national BCBS Association (there are approximately 20 BCBS franchises in the US. CareFirst just being one of them) links together all the PPO networks from the various BCBS companies. You employees in CA would simply use a CA BCBS PPO provider. The claims are submitted to the local BCBS carrier. The claim date is routed to BCBS nation and from there to CareFirst. The claim payments are paid in reverse order. Staff would have the same benefits as you do here.
2. An employer is generally required to treat all like employees the same. Any employee working on average 30 hours per week qualify.
  - a. Your current plan is not set up to insure employees working part-time. The ACA sets the 30 hour threshold. CareFirst will allow you to insure employees who work as few as 17 ½ hours. Your current contract would need to be amended to include part-time (less than 30 hours).
  - b. If you are looking to exclude the CA staff and they are not similarly situated employees to those in MD, then further research would need to be done. We could send the question to our compliance team. Below are the general rules for creating an excluded class:
    - i. G&R would need to specifically state that hourly staff is not covered
    - ii. G&R would need to specifically state that the CA office is not covered

Happy to get a note off to our compliance team. But, would like your thoughts before I do so.

Regards,

[REDACTED] Advisor



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**From:** [REDACTED]  
**Sent:** Wednesday, April 18, 2018 9:06 AM  
**To:** [REDACTED]  
**Subject:** FW: Golsstein & Russell - Questions

[REDACTED] Account Manager



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, April 17, 2018 5:34 PM  
**To:** [REDACTED]  
**Subject:** Questions

Hi [REDACTED]

We are looking to hire 2 employees in California to do some research for us, possibly on an hourly basis. We have two related questions:

1. Would our current health insurance plan be valid in California?
2. Under what circumstances are we required to give them benefits? We are mostly thinking about hours per week worked, but perhaps there are other factors.

Many thanks,  
[REDACTED]